

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

TRAVELERS CASUALTY AND SURETY COMPANY
OF AMERICA,

Plaintiff,

vs.

YOUNG CONSTRUCTION & PAVING, LLC; KAREN
B. YOUNG; GORDON T. YOUNG; JEFFREY D.
YOUNG; MONICA L. YOUNG; JOSEPH WELLS;
TERRI WELLS; LUKE D. VANDER BLEEK; and
JOAN L. VANDER BLEEK,

Defendants.

and

JOSEPH WELLS; TERRI WELLS; LUKE D. VANDER
BLEEK; and JOAN L. VANDER BLEEK,

Counter-Plaintiffs/Third-Party Plaintiffs,

vs.

TRAVELERS CASUALTY AND SURETY COMPANY
OF AMERICA,

Counter-Defendants,

and

TRISSEL, GRAHAM AND TOOLE, INC., a
corporation, DANIEL CURRAN, and ROGER A.
COLMARK,

Third-Party Defendants.

No. 8-CV-50008

**MOTION TO EXTEND TIME TO CONDUCT 26(f) MEETING
AND PREPARE PROPOSED CASE MANAGEMENT ORDER**

NOW COME the Defendants, JOSEPH WELLS, TERRI WELLS, LUKE D. VANDER BLEEK, and JOAN L. VANDER BLEEK, by RENO & ZAHM LLP, by Robert A. Fredrickson and Jack D. Ward, and moves this Court for an extension of time for the parties to conduct a Federal Rules of Civil Procedure 26(f) conference and tender a proposed case management order, and in support thereof state as follows:

1. On February 20, 2008 the clerk docketed that the parties were to hold a Rule 26(f) meeting and provide individual case management orders and briefs in support by March 5, 2008.

2. On February 22, 2008 Robert A. Fredrickson proposed in writing certain discovery dates to Plaintiff's counsel. On February 28, 2008 counsel for the Plaintiffs responded that no discovery was needed.

3. Lead trial counsel, Robert A. Fredrickson, has been out of town since February 29, 2008 and will not return until Monday, March 10, 2008, and is unable to respond and resolve issues through a 26(f) meeting and provide a case management order by March 5, 2008.

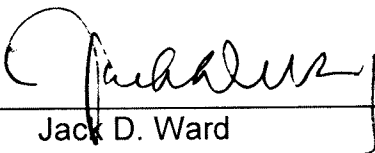
4. It is in the best interests of the parties and the Court to allow the parties to attempt to conduct a meaningful 26(f) meeting and, if possible, provide an agreed case management order.

WHEREFORE, Defendants pray that the Court extend the time for conducting a 26(f) meeting and for filing of a case management order with supporting briefs until March 14, 2008, and for such other relief as may be appropriate.

Dated this 5th day of March, 2008.

JOSEPH WELLS; TERRI WELLS;
LUKE D. VANDER BLEEK; and JOAN
L. VANDER BLEEK

By: RENO & ZAHM LLP

By: 
Jack D. Ward

RENO & ZAHM LLP
BY: ROBERT A. FREDRICKSON, #00868469
JACK D. WARD, #3125783
MICHAEL J. SCHIRGER, #6290691
2902 McFarland Road
Perry Creek Plaza, Suite 400
Rockford, IL 61107
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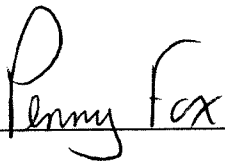
CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served upon the following:

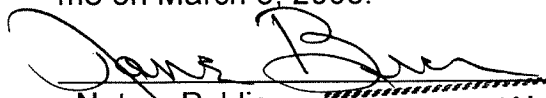
Atty. John E. Sebastian
Atty. Albert L. Chollet, III
Hinshaw & Culbertson, LLP
222 No. LaSalle St., Suite 300
Chicago, IL 60601


Atty. James M. Allen
Hinshaw & Culbertson, LLP
100 Park Avenue
P.O. Box 1389
Rockford, IL 61105

by depositing the same in the United States Mails, postage prepaid, addressed as above, at Rockford, Illinois on March 5, 2008.



Subscribed and sworn to before
me on March 5, 2008.


Notary Public



ROBERT A. FREDRICKSON, #412
Reno & Zahm LLP
2902 McFarland Road, Suite 400
Rockford, IL 61107
815/987-4050